

The Honorable Marsha J. Pechman  
Noting Date: September 25, 2020

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

NANCY GILL,

Plaintiff,

vs.

MICHAEL MAGAN, MICHAEL GONZALEZ,  
TIMOTHY RENIHAN AND THE CITY OF  
SEATTLE,

Defendants.

No. 2:19-cv-00860-MJP

DEFENDANTS' RESPONSE TO  
PLAINTIFF'S MOTION FOR ORDER  
REQUIRING KING COUNTY  
CORRECTIONAL FACILITY TO  
RELEASE INMATE RECORDS

Noting Date: September 25, 2020

Defendants Michael Magan, Michael Gonzalez, Timothy Renihan and the City of Seattle ("Defendants"), by and through their attorneys of record, respond to Plaintiff's Motion for Order Requiring King County Correctional Facility to Release Inmate Records ("Plaintiff's Motion").

Defendants do not agree with the relevance or admissibility of the records sought in Plaintiff's

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REQUIRING KING COUNTY CORRECTIONAL FACILITY TO RELEASE  
INMATE RECORDS - 1  
2:19-cv-00860-MJP

**Peter S. Holmes**  
Seattle City Attorney  
701 5th Avenue, Suite 2050  
Seattle, WA 98104-7095  
(206) 684-8200

1 Motion. However, Defendants do not oppose Plaintiff's Motion. Further, Defendants do not waive  
2 the ability to challenge relevance or admissibility in the future.

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4 DATED this 21<sup>st</sup> day of September, 2020.

5 PETER S. HOLMES  
6 Seattle City Attorney

7 By: s/ Susan Park  
8 Susan Park, WSBA# 53857  
9 Ghazal Sharifi, WSBA# 47750  
Assistant City Attorneys

10 E-Mail: Susan.Park@seattle.gov  
E-Mail: Ghazal.Sharifi@seattle.gov

11 Seattle City Attorney's Office  
12 701 Fifth Avenue, Suite 2050  
Seattle, WA 98104  
13 Phone: (206) 684-8200

14 *Attorneys for Defendants City of Seattle, Michael Magan,*  
*Michael Gonzalez and Timothy Renihan*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 21, 2020 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Darryl Parker, WSBA# 30770 Civil Rights Justice Center, PLLC 2150 N. 107 <sup>th</sup> Street, Suite 520 Seattle, WA 98133  <i>[Attorney for Plaintiff]</i>	( x ) Via Email <a href="mailto:DParker@civilrightsjusticecenter.com">DParker@civilrightsjusticecenter.com</a> <a href="mailto:jhenderson@civilrightsjusticecenter.com">jhenderson@civilrightsjusticecenter.com</a> <a href="mailto:kbasu@civilrightsjusticecenter.com">kbasu@civilrightsjusticecenter.com</a> <a href="mailto:adiaz@civilrightsjusticecenter.com">adiaz@civilrightsjusticecenter.com</a> <a href="mailto:pandrews@civilrightsjusticecenter.com">pandrews@civilrightsjusticecenter.com</a>
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s/ Jennifer Litfin  
Jennifer Litfin, Paralegal